

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
*Alexandria Division*

UNITED STATES OF AMERICA

v.

CLAUDIO ALVAREZ RODRIGUEZ  
a/k/a: "Manuel Alvarez,"

Defendant.

Case No. 1:21-cr-179

Hon. Anthony J. Trenga

**STATEMENT OF FACTS**

The United States and the defendant, CLAUDIO ALVAREZ RODRIGUEZ, agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. The defendant is a native and citizen of Mexico who does not have lawful status in the United States and is an "alien" for the purposes of 8 U.S.C. § 1326(a).
2. On or about December 31, 2001, the defendant was convicted of a felony in the Superior Court for Los Angeles County, California.
3. The defendant was removed from the United States, pursuant to a final order of removal, on or around September 12, 2002, from at or near Calexico, California.
4. Thereafter, the defendant reentered the United States. He was removed from the United States, pursuant to an order of expedited removal, on or around February 15, 2003, from at or near San Ysidro, California.
5. Thereafter, the defendant reentered the United States. He was removed from the United States, pursuant to a reinstatement of a removal order, on or around February 2, 2004, from at or near San Ysidro, California.

6. On or about July 14, 2021, United States Immigration and Customs Enforcement officers found the defendant, who was being held on local charges at the Rappahannock Regional Jail, in Rappahannock County, Virginia, within the Eastern District of Virginia.

7. At no time prior to his reentry, and at no time thereafter, did the defendant obtain the consent of the Attorney General of the United States or the Secretary of the Department of Homeland Security to reenter the United States or reapply for admission to the United States.

8. This statement of facts includes those facts necessary to support the defendant's plea of guilty to the charge listed in the indictment in this case. It does not include each and every fact known to the defendant or to the United States and is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

9. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully Submitted,

Raj Parekh  
Acting United States Attorney

Date:

10/06/2021


By:

Jacob M. Green

Jacob M. Green  
Special Assistant United States Attorney  
Marc J. Birnbaum  
Assistant United States Attorney

Defendant's Stipulation and Signature: After consulting with my attorney I hereby stipulate that the above Statement of Facts is true and accurate, and that if the matter proceeded to trial, the United States would have proven the same beyond a reasonable doubt.

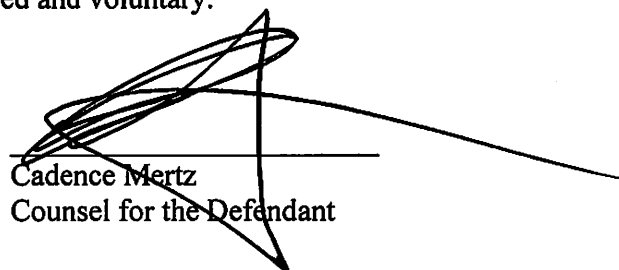
Date: 10-6-21



Claudio Alvarez Rodriguez  
Defendant

Defense Counsel's Signature: I am the attorney for the defendant, Claudio Alvarez Rodriguez, in this case. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is informed and voluntary.

Date: 10/6/21



Cadence Mertz  
Counsel for the Defendant